

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>Adoptive Family #1 and Their Daughter</b>	:	
<b>A., et al,</b>	:	<b>CASE NO.: 1:18-cv-179</b>
	:	
<b>Plaintiffs,</b>	:	<b>Judge: Susan J. Dlott</b>
<b>v.</b>	:	<b>Magistrate Judge: Karen Litkovitz</b>
	:	
<b>Warren County, Ohio/Warren County</b>	:	<b><u>STIPULATED POTECTIVE ORDER</u></b>
<b>Board of Commissioners</b>	:	
	:	
<b>Defendants.</b>	:	

This stipulated protected order covers all depositions and exhibits taken prior to the class action hearing in this case including but not limited to the depositions of Adoptive Family members #1 – #7. This protective order also covers those portions of the depositions of Warren County Children’s Services (WCCS) Director Susan Walther, former WCCS Director Patti Jacobs, WCCS employee Melissa Pittman, and Dr. Timothy O’Hanlon to the extent any of their testimony addresses facts related to Adoptive Families #1 – #7. These depositions and exhibits shall be subject to discovery between and among the parties but shall otherwise be kept confidential.

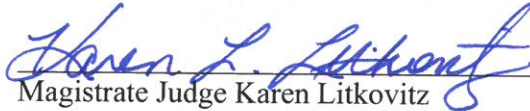
By agreement of the parties, these records shall be held strictly confidential by counsel for each party and may only be disclosed to counsel for each party, the parties, witnesses who need to know the material, and expert witnesses retained by counsel for each party. None of the documents covered by this protective order may be disclosed to any other person, or member of the public. If any document subject to this protective order is produced, copied, used in a deposition, or at trial, it shall be marked prominently by the party producing it with the word “CONFIDENTIAL.” Any document subject to this order used at trial, in discovery, in a

deposition, expert report, pleading, or in any other way so as to make it a potentially public record, it shall be so submitted "under seal" with prior permission of the Court, upon motion and for good cause shown.

This Protective Order further authorizes these materials and no others may be filed with the Court under seal as they contain personal private and sensitive information about families and children that are not appropriate for public disclosure. Unless the Court orders otherwise, all sealed documents shall be filed according to <sup>S</sup>~~N~~. D. Ohio Civ. R. 5.2. <sup>1</sup>.

At the conclusion of the litigation, all written materials, including copies made thereof, subject to this protective order shall be destroyed.

IT IS SO ORDERED.

  
Magistrate Judge Karen Litkovitz

Agreed to by:

/s/  
Alphonse Gerhardstein (0032053)  
Attorney for Plaintiff

/s/  
J. Stephen Teetor  
Attorney for Defendants